

**IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI  
FIRST JUDICIAL DISTRICT**

**MISSISSIPPI DEPARTMENT OF HUMAN SERVICES** **PLAINTIFF**

**v.** **CAUSE No. 22-cv-286-EFP**

**MISSISSIPPI COMMUNITY EDUCATION CENTER, INC., ET AL.** **DEFENDANTS**

**and**

**MISSISSIPPI COMMUNITY EDUCATION CENTER, INC.** **COUNTER-PLAINTIFF**

**v.**

**MISSISSIPPI DEPARTMENT OF HUMAN SERVICES** **COUNTER-DEFENDANT**

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**MOTION TO COMPEL DEWEY PHILLIP BRYANT  
TO PRODUCE DOCUMENTS RESPONSIVE TO SUBPOENA DUCES TECUM**

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COMES NOW, Mississippi Community Education Center (“MCEC”), pursuant to Mississippi Rules of Civil Procedure 26, 34(c) and 45, and respectfully moves the Court for an order compelling Dewey Phillip Bryant (“Governor Bryant”) to produce documents responsive to MCEC’s subpoena duces tecum.

1. On July 25, 2022, MCEC issued a subpoena duces tecum to Governor Bryant. Doc 93 (“Subpoena”).<sup>1</sup>

2. The Subpoena seeks documents related to the volleyball facility at the University of Southern Mississippi (“Volleyball Facility”). Ex. 1.

3. On August 26, 2022, Governor Bryant objected to producing documents. MCEC, therefore, moves to compel. “The party serving the subpoena may, if objection has been made,

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<sup>1</sup> Similar subpoenas were issued to the University of Southern Mississippi Athletic Foundation, the Attorney General’s Office of the State of Mississippi, and the Mississippi Institutions of Higher Learning.

move at any time upon notice to the person served for an order to compel the production or inspection.” Miss. R. Civ. P. 45(d)(2)(B).

4. A subpoena is governed by Rule 26 for purposes of a motion to compel. *Flechas v. Pitts*, 138 So.3d 907, 910 (Miss. 2014). Pursuant to Rule 26, MCEC is entitled to discover “any matter, not privileged, which is relevant to the issues raised by the claims or defenses of any party.” Miss. R. Civ. P. 26(b). To be “relevant,” a document simply must be reasonably calculated to lead to the discovery of admissible evidence. *Id.* at 26(b)(1).

5. The Subpoena to Governor Bryant seeks documents that relate to the Volleyball Facility, its funding, or its lease agreements, all of which are relevant to the Claims, Defenses, and Counterclaims.

6. In its Complaint, MDHS claims it is entitled to recover \$1,100,000 paid to Favre Enterprises, Inc. Doc. 2, ¶130. MCEC paid Favre \$1,100,000 expressly to provide Favre with additional funds for construction of the Volleyball Facility. Ex. 4-5.

7. In its Answer, MCEC raises Defenses and Counterclaims that preclude or limit MDHS from recovering from MCEC for TANF expenditures, alleged to be impermissible, but which were made with the knowledge, involvement, or approval of MDHS Executives, including Governor Bryant. *See* MCEC’s Answer, Affirmative Defenses, and Counterclaims, Doc. 70, pp. 2-5, 28-30.

8. In her Answer, Co-Defendant Nancy New states that “Governor Phil Bryant directed Defendant to provide funds to Brett Favre, and Defendant caused MCEC to contract with Favre Enterprises, Inc. in the amount of \$1,100,000....” Defendant Nancy New’s Answer and Affirmative Defenses, Doc. 72, ¶130.

9. MDHS has issued its own subpoena to the University of Southern Mississippi Athletic Foundation, Inc. (the, “Foundation”) confirming the relevance of documents that relate to the Volleyball Facility, generally, and Governor Bryant’s involvement in providing funding for construction of the Volleyball Facility, specifically. Doc. 67.

10. MCEC’s Subpoena seeks documents from Governor Bryant that are not only relevant to the Claims, Defenses, and Counterclaims, as described above, but also reasonably calculated to lead to the discovery of admissible evidence.

11. Communications between Governor Bryant and Brett Favre, Governor Bryant and Nancy New, and Brett Favre and Nancy New, which are detailed in the Memorandum in Support, suggest that MDHS Executives, including Governor Bryant, knew that Favre was seeking grant funds from MDHS to build the Volleyball Facility; approved, expressly or impliedly, the use of MDHS grant funds for construction of the Volleyball Facility; and participated in directing, approving, or providing Favre MDHS grant funds to be used for construction of the Volleyball Facility. Ex. 2-32.

12. MCEC is entitled to discover all documents that relate to the Volleyball Facility, its funding, and the foregoing actions of MDHS Executives, including Governor Bryant, as these actions, as described in the Memorandum in Support, directly impact MCEC’s Defenses and Counterclaims, including, without limitation, its Defenses and Counterclaims applicable to MDHS’s Claim to recover \$1,100,000 paid to Favre Enterprises, Inc.

WHEREFORE, PREMISES CONSIDERED, MCEC respectfully requests that the Court enter its order compelling Governor Bryant to produce all documents responsive to MCEC’s subpoena duces tecum within five (5) days of the Court’s order.

To the extent Governor Bryant withholds documents based on claims of attorney-client privilege or work product doctrine, MCEC respectfully requests that the Court order Governor Bryant to produce a privilege log within ten (10) days of the Court's order describing each document withheld in sufficient detail that MCEC may assess the attorney-client privilege and work product doctrine claims.

MCEC also requests all other relief the Court may deem appropriate.

Respectfully submitted, this the 12<sup>th</sup> day of September, 2022.

CARROLL BUFKIN, PLLC

/s/ Thomas G. Bufkin  
Thomas G. Bufkin, MSB No. 10810

On behalf of Defendant MCEC

Of Counsel:

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day filed the above and foregoing *via* MEC, which automatically provides a copy to all counsel of record.

I also certify that I have this day provided notice of this motion to compel to counsel for Governor Phil Bryant, as required by Mississippi Rule of Civil Procedure 45(d)(2)(B).

Dated: September 12, 2022

/s/ Thomas G. Bufkin  
Thomas G. Bufkin





## Messages

Brett Farve

7/24/2017 5:09:49 PM

Nancy thank you again!!! John mentioned 4 million and not sure if I heard him right. Very big deal and can't thank you enough 😊

**Exhibit 3**

## Messages

Brett Farve

7/29/2017 4:55:53 AM

Also I want to help you and was thinking a PSA is one option that could be done quick and easy to put together 😊

**Exhibit 4**

## Messages

Brett Farve

7/29/2017 6:38:30 AM

Ok. I could record a few radio spots here initially  
I'm sure right here. See how it is received and  
whatever compensation could go to USM

7/29/2017 6:45:40 AM

4 million dollars😬😬😬. Just kidding. The first  
phase could be \$500,000 and after Sept. we can  
renew. This is a good approach. What do you think?

7/29/2017 7:07:14 AM

Was just thinking that here is the way to do it!!

7/29/2017 7:10:58 AM

Exactly. Ok, Zach can get you a MOA or you may  
have one that you would rather use. Either way we  
can get this done.

**Exhibit 5**

7/29/2017 7:26:38 AM

Excuse my football intelligence but what is MOA?



7/29/2017 7:53:14 AM

Working agreement, , no big deal. We will send you one and you can adjust

7/29/2017 8:26:28 AM

My biggest concern is time commitment so we can manage that I'm good

7/29/2017 9:41:34 AM

Please do not worry about your time commitment. We can only imagine how many directions you are pulled. Just a few things here and there, spread out, will be plenty.

7/29/2017 9:42:22 AM

Ok great

**Exhibit 5 Cont.**

## Messages

Brett Farve

8/2/2017 3:21:49 PM

John said you guys have a big meeting Monday with university. Hope we hit a homerun. Looks as though the facility is gonna be more than we thought which is always the case.

**Exhibit 6**

## Messages

Brett Farve

8/3/2017 4:35:00 PM

If you were to pay me is there anyway the media  
can find out where it came from and how much?

8/3/2017 6:26:46 PM

No, we never have had that information publicized.  
I understand you being uneasy about that though.  
Let's see what happens on Monday with the  
conversation with some of the folks at Southern.  
Maybe it will click with them. Hopefully.

8/3/2017 6:59:35 PM

Ok thanks

8/4/2017 1:20:31 PM

Wow, just got off the phone with Phil Bryant! He is  
on board with us! We will get this done!

8/4/2017 1:21:05 PM

Awesome I needed to hear that for sure

**Exhibit 7**

## Messages

Brett Farve

8/10/2017 2:17:32 PM

Just left from Hey, the first part of this is from Dr. Cannon: president and general counsel – we are moving ahead to get this done– My response a few minutes ago; That is wonderful news. Thank you! I am so excited for this opportunity for Southern!

8/10/2017 2:20:48 PM

So...I think I will just pass over the Pearl and head right on to that bar! Hallelujah!

8/10/2017 2:33:59 PM

Wow wow wow!! Great news

**Exhibit 8**

## Messages

Brett Farve

8/19/2017 6:51:39 AM

Morning. I got a call yesterday from Gordon Cannon that their meetings went well on accepting the money, etc. Next Wed. there is another meeting with MDHS attorney and USM to make sure all the wording is good before it goes to IHL. Still keeping my fingers crossed. I still think it will happen.

8/19/2017 7:40:33 AM

Thanks Nancy. Jon Gilbert said the same thing yesterday. 🙏

**Exhibit 9**

## Messages

Brett Farve

8/23/2017 9:33:09 AM

Brett, I just received this info from Dr. Cannon. 👍  
👍👍 Nancy, just finished the meeting with Garrig and Jacob everything is a go. Daniel Feig will be in touch with you or Zack to ask for a draft lease. Our target date for having everything complete for board approval is Sept22. I know this a a short time line but that would get us approval I. October which would not delay bidding the project as currently scheduled

## Messages

Brett Farve

10/19/2017 7:21:40 AM

It's a go. All approved by IHL!

10/19/2017 7:36:54 AM

Finally and thanks Nancy. I hope it's enough now.  
Jon said 500k has to go to renovations for reed  
green and another 500 to maintenances fund

10/19/2017 7:37:08 AM

See ya next week 😊

10/19/2017 8:10:12 AM

We will still fundraiser, etc. we will get the rest.  
Also, I thought Jon let you know but we had to  
postpone the 25th due to Dr. Bennett's request but  
I will get us another date.

10/19/2017 8:12:43 AM

Ok 😊

**Exhibit 11**

10/19/2017 8:16:44 AM

Also, in the next few days could I send you a draft proposal to do a couple of psa's, etc. for Families First.

10/19/2017 8:17:09 AM

K good

**Exhibit 11 Cont.**

## Messages

Brett Farve

11/2/2017 3:43:41 PM

I saw the Gov last night. We will still plan the fundraiser as well when we can get another date from him that works with your time, too. Surely, Southern folks won't say to postpone it again. At any rate it's all going to work out.

11/2/2017 3:44:15 PM

I'm ready👍

**Exhibit 12**

## Messages

Brett Farve

12/27/2017 8:22:36 PM

Nancy Santa came today and dropped some money off 😊😊 thank you my goodness thank you. We need to setup the promo for you soon. Your way to kind

12/27/2017 8:25:31 PM

Yes, he did. He felt you had been pretty good this year! After these holidays let's get our calendars together on a few activities, etc. please know if we asked you to do something and you can't, it is ok. We will get it all worked out.

12/27/2017 8:26:29 PM

How is the building coming along and Beach Volleyball? Is it the way you had hoped?

12/27/2017 8:44:31 PM

Well it's more of when they will start it. Now it's February they are saying 🙄

**Exhibit 13**

## Messages

Brett Farve

3/28/2018 3:16:12 PM

Nancy I wanted to update you on facility. The bids all are in and shockingly the lowest is 6.9. The architects were confident it would come in lower than what we have saved. Really frustrating. Jon said he wanted to go back to lowest bid and talk to them about getting it down to 5.9. I'll keep you updated.

3/28/2018 3:25:49 PM

Wow, that is disturbing. Lordy, all this time and now to find this out. Well, let's see what the lowest bid comes back with and then if we need to, we will roll up our sleeves and get the rest. We can still have the fundraiser at the Governor's mansion, too. We can use Phil's business list that he offered earlier. I will be thinking and hopefully there will be something in the new budget for Families First to offer. But that's not til July. I will be thinking on other things. Thanks for letting me know.

**Exhibit 14**

**From:** [John Davis](#)  
**To:** [Ted DiBiase](#)  
**Subject:** Brett Farve and Jake Smith Youth Educational/Research Program  
**Date:** Tuesday, January 1, 2019 9:38:16 AM  
**Attachments:** [attachment.ics](#)

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This meeting was requested by Brett Farve and the Governor to discuss the Educational Research Program that addresses brain injury caused by concussions. They also want to discuss the new facility at USM

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## Messages

Brett Farve

5/15/2019 1:16:31 PM

Nancy I asked the college for an update on what is owed as of today and it's 1,070,000. It's not due right now. And we almost have the final plans for beach. They look great. Of course you can help out again. And regardless I owe you big time. 😊

5/16/2019 11:23:11 AM

Hey Brett. That amount is not too bad. We will see what we can do hopefully after July 1. I can't wait to hear about the plans for the beach. Keep me posted.

**Exhibit 16**

## Messages

Brett Farve

5/30/2019 5:12:48 AM

Nancy are you still confident you can cover the 1.8  
and that number will probably be less as we get  
closer

\* \* \*

5/30/2019 5:54:20 AM

Morning. In a meeting with John Davis now. He said  
we will cover much of it but may have to be in a  
couple of payments. We are on board!

**Exhibit 17**

## Messages

Brett Farve

6/26/2019 6:04:21 AM

Nancy as of today the number is 1.95 mill for everything. It's not due and if anything that number will go down but not up. Deanna and I keep chipping away also. Thank you as always

6/26/2019 7:31:12 AM

Hey there. Steadily working on this and hope to have some relief after the first of July. I am feeling good about getting some of it knocked down and then more should be available soon after.

6/26/2019 7:32:00 AM

Is this amount on the facility or beach volleyball?

6/26/2019 7:34:22 AM

Total

**Exhibit 18**

## Messages

Phil B. Cell

7/2/2019 4:05:41 AM

Governor, may I please meet with you for a few minutes this morning? It truly is important and I do appreciate any time you may have to give me. Thank you. Nancy New

7/2/2019 4:06:54 AM

I can see you at 8:30 at the Sillers Office.

7/2/2019 4:07:18 AM

Thank you. I will be there.

7/2/2019 4:07:44 AM



## Messages

Brett Farve

7/16/2019 3:53:40 AM

Nancy if I can help you in any way you know I will.  
Please know that

7/16/2019 4:11:58 AM

Thanks Brett. That means a lot to me. I am ok, just politics and people. We are trying to stay above all the foolishness and we will. Too much good stuff to get done. I am concerned though that I may not be able to assist you in Aug. as we had planned. I will continue to work on that though. I am not sitting still! Hope all is well with you.

7/16/2019 4:13:15 AM

Oh goodness. Even if it's a little later? The due date

7/16/2019 4:19:39 AM

Will continue to work on it for sure. 🍑🍑

**Exhibit 20**

7/16/2019 4:21:52 AM

I can try and delay as long as possible if you think that would help. The beach is at least 6 months away from any payment

7/16/2019 4:23:52 AM

Do that and that will give me time to work some other angles for us. 👍

7/16/2019 1:34:34 PM

About to see Governor Bryant. Anything I can say to him that could help?

7/16/2019 1:36:38 PM

Let him know how much we work together on youth development, sports programs that instill leadership and future work skills

**Exhibit 20 Cont.**

## Messages

Brett Farve

7/16/2019 2:05:30 PM

I will handle that... long story but had to make a change. But I will call Nancy and see what it will take.👍

7/16/2019 2:05:40 PM

From Governor

**Exhibit 21**

## Messages

Phil B. Cell

7/16/2019 2:41:57 PM

Just left Brett Farve. Can we help him with his project. We should meet soon to see how I can make sure we keep your projects on course.

7/16/2019 2:58:47 PM

I would really appreciate having the opportunity to follow through with all the good things we are working on, especially projects like Brett's and Tim Bennett's. I can make myself available when you have time. I would really appreciate a little of your time soon.

7/16/2019 3:07:28 PM

I can do 4pm on Thursday.

7/16/2019 3:09:59 PM

Thank you. I can be there.

**Exhibit 22**

## Messages

Brett Farve

7/16/2019 5:40:51 PM

I am meeting with the Gov at 4 on Thursday. He wants me to continue to help you and us get our project done. I feel good about that.

7/16/2019 5:41:28 PM

I love John so much. And you too 😊

**Exhibit 23**

## Messages

Brett Farve

7/25/2019 2:58:17 PM

You think I should send the Governor a message ?

7/25/2019 3:10:28 PM

It wouldn't hurt. I sent that proposal to Whitney, his legal person the same day I copied you in. I think he has been gone some this week but today he did announce John Davis' replacement from somewhere, maybe he is back in Jackson. Maybe he hasn't had a chance to talk to Whitney but we need to get his approval sooner than later. I know he is in town tomorrow according to his calendar.

7/25/2019 3:49:49 PM

👍 just back in town. Met with new Director today. It will take time to get the Auditors Report. Working on it..

7/25/2019 3:49:56 PM

From Phil

**Exhibit 24**

7/25/2019 3:57:00 PM

Hmm. Not sure what to make of that but maybe whatever he is waiting on will be done soon. He has so much to deal with all the time. I think the new Director will be good to work with, too. He is a retired FBI Director. I look forward to getting to know him. I hope to meet with him in the next few days.

7/25/2019 3:58:17 PM

He said for us to keep the faith also 😊

**Exhibit 24 Cont.**

## Messages

Brett Farve

8/2/2019 6:01:13 AM

Any word? Met the new Director yet?

8/2/2019 6:07:14 AM

Not yet, but I have asked for one ASAP. Yesterday was his first day so I am in hopes to get to see him at least by Monday. I am very anxious to get in there and talk with him. The Gov wants me too, so I am counting on his push, too.

8/2/2019 6:14:00 AM

Ok

8/2/2019 6:15:10 AM



**Exhibit 25**

## Messages

Brett Farve

8/8/2019 8:36:55 AM

Gov. texted and said y'all are meeting on the proposal I gave him. Call or text if you need my help! We are going to get this done!!!

8/8/2019 9:05:14 AM

We met in regards to a issue poncho was needing resolved and he only had 15 minutes but he did say at the end that he will get this done with you!!!

8/8/2019 9:18:35 AM

He sure came across as sincere and believable

**Exhibit 26**

## Messages

Brett Farve

8/8/2019 11:19:54 AM

He said something about project managers. We will need those, too. We have to make this all about teaching, education, obesity prevention, exercise, etc. and we can pay a lease or facilities' use.

8/8/2019 11:20:59 AM

Should I forward this to him as well?

8/8/2019 11:21:37 AM

Sure that is fine.

**Exhibit 27**

## Messages

Brett Farve

8/10/2019 4:43:20 PM

What did the Gov say to you about our proposal? I know the new director knows about it because I brought it up to him. He asked if that was the one that the Gov's name was to go on the bld??? I said yes but honestly I couldn't read why he asked that about his name. Keep that quiet right now. Lots of politics I think.

\* \* \*

8/10/2019 4:56:09 PM

The only the thing Phil said was the questions I relayed to you but Phil is adamant it will get done. Of course he is a politician so I'm a little uneasy

8/10/2019 5:26:09 PM

Yep, I totally agree. I hope he will stay steady and help us get it done.

8/10/2019 5:39:09 PM

I'll keep asking weekly

**Exhibit 28**

8/12/2019 10:39:17 AM

Can you talk for a quick second?

8/12/2019 10:43:53 AM

I'll call you now

8/12/2019 10:44:08 AM

Good

8/14/2019 6:33:04 AM

In Ghana, Africa today. Be back on Saturday. Nancy has to provide the proper documentation to MDHS. It's all up to her get the paperwork in and then I can help.

8/14/2019 6:33:15 AM

From Governor just now

**Exhibit 28 Cont.**

8/14/2019 7:16:58 AM

Wow, I have given the proper information to several people several times. 🙄 Even the new director mention this proposal to me the other day so I know they have seen it. But I will definitely submit it again today. When we get this done and you and I have a few minutes to visit, I will share a couple of my real thoughts with you on some folks! 😏😏 But in the meanwhile I am sending this proposal again and will keep pushing. Thanks so much.

8/14/2019 7:24:14 AM

Do you want me to say anything back to Governor?

8/14/2019 7:28:42 AM

He said to me just a second ago that he has seen it but hint hint that you need to reword it to get it accepted.

8/14/2019 7:31:04 AM

Reword?? Wonder what he means. I am making a call now to get a little more information from someone on the inside and will get back with you. Just let him know that it was submitted but I am reworking it today.

**Exhibit 28 Cont.**

8/14/2019 7:31:45 AM

Ok

8/14/2019 2:40:51 PM

Not yet but I have left messages for 2 different people. They will call.

8/14/2019 2:58:46 PM

Ok

8/16/2019 6:42:33 AM

That's all I know to tell her. Hopefully she can put more details in the proposal. Like how many times the facility will be used and how many child will be served and for what specific purpose.

8/16/2019 6:42:44 AM

From Governor just now

**Exhibit 28 Cont.**

8/16/2019 6:50:13 AM

Great, that's what we did. Thanks.

8/16/2019 7:00:12 AM

I am just getting to Gulfport for a meeting but I am getting even more details added to the proposal and sent as an addendum now.

8/16/2019 7:20:32 AM

Ok

8/16/2019 7:42:38 AM

Confidential; Do you get the impression that the governor will help us?

8/16/2019 7:43:56 AM

I really feel like he is trying to figure out a way to get it done without actually saying it

**Exhibit 28 Cont.**

## Messages

Brett Farve

8/16/2019 3:05:12 PM

I would have listed the number of people proposed to be reached by the program and the number of employees necessary to achieve these goals. Taking off from Ghana so may be my last message for a while.

8/16/2019 3:05:41 PM

From Governor just now. He did like it but added above text

8/16/2019 3:07:23 PM

Great, I can send that in as well!

8/17/2019 7:38:11 AM

Would like me to send the latest copy to the Governor?

8/17/2019 7:44:50 AM

I am going through it again in a little bit and then let's send it.

**Exhibit 29**

## Messages

Brett Farve

8/23/2019 8:42:16 AM

Governor said we should meet with him and new director. Tuesday I can't but Monday I'm open

8/23/2019 8:43:34 AM

I am open Monday too. Is the Governor setting it up?

8/23/2019 8:47:33 AM

I am gone all next week.. have Nancy get with Bethany and schedule something for us all..

8/23/2019 8:50:46 AM

From Governor

\* \* \*

8/26/2019 1:11:37 PM

It's confirmed! The Gov's office. Sept. 4th at 2:00.

**Exhibit 30**



STATE OF MISSISSIPPI  
Phil Bryant, Governor  
DEPARTMENT OF HUMAN SERVICES  
Christopher Freeze  
Executive Director

September 6, 2019

Mississippi Community Education Center  
Dr. Nancy New, Executive Director  
2525 Lakeward Dr., Suite 200  
Jackson, MS 39216

VIA ELECTRONIC MAIL

Dear Dr. New,

This letter is in response to your request for additional funds for several purchases and/or contracts which MCEC entered into for commodities or services. We understand from your prior electronic communications you are stating MCEC incurred these costs at the direction of former Executive Director John Davis.

In an email dated August 30, 2019, MDHS advised we could add the following items to your TANF subgrant based on information and documentation provided to MDHS:

- Two payments of \$500,000.00 requested by Family Resource Center
- One payment of \$52,000.00 for Rick Rigsby
- One payment of \$35,000.00 for Friendship Connection

In addition, MDHS is adding to your TANF subgrant \$85,992 related to the lease at Oakley Youth Development Center.

Further, we advised the additional \$804,213.10 requested as additional payment to KLLM for amounts above the allowable cost of \$4,000.00 per student was not allowed according to federal regulations, specifically 2 CFR 200.400-405. MDHS does not have and has never had the authority to circumvent federal regulations or instruction with federal funds nor do we have the authority to instruct subgrantees to do so.



200 South Lamar St.  
Jackson, Mississippi 39205  
Phone 601-359-1500  
[www.mdhs.state.ms.us](http://www.mdhs.state.ms.us)

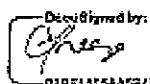


To ensure we have specifically asked for all documentation which may exist, MDHS is requesting any and all documentation of the procurement of the items purchased and/or the contract awarded according to Section 6, Procurement and Purchasing, of the MDHS Subgrant/Agreement Manual. Regardless of whether or not John Davis wanted you to lease or purchase these items, he cannot authorize subgrantees to enter into contracts or to purchase commodities outside of the requirements of federal procurement regulations at 2 CFR 200.317-326.

Specifically, please provide a copy of any quotes which were obtained for any purchases under \$50,000.00 or any legal notices and proof of publication and bids obtained for purchases over \$50,000.00, to include the requests for reimbursement for Cirlot and City Centre.

MDHS will review any further documentation that is provided and consider payment for such items as is warranted.

Sincerely,

Digitally signed by:  


Christopher Freeze  
Executive Director

## Messages

Phil B. Cell

12/18/2019 5:05:12 AM

Did y'all get any Of the new programs from DHS.?

12/18/2019 5:08:20 AM

Yes, we did. From all the craziness going on, we had been made to believe we were not getting refunded. But we did. "Someone" was definitely pulling for us behind the scenes. Thank you.

12/18/2019 5:08:52 AM

